REMARKS/ARGUMENTS

Claims 1-22 remain in this application, all of which stand rejected. Claims 23-26 have been canceled.

1. Rejection of claims 1-4 and 11-20 Under 35 USC 102(b)

Claims 1-4 and 11-20 stand rejected under 35 USC 102(b) as being anticipated by Takahashi (US Pat. No. 6,097,202).

With respect to claim 1, the Examiner asserts, in part, that Takahashi discloses:

> . . . a plurality of passive circuit components including printed wiring patterns (34a,34b,34c) integrated with the package (column 10 lines 41-47), ones of which are coupled in parallel between ones of the plurality of contacts (36a,36b) on the package and the test sensor port.

Examiner's Office Action, p. 2, sec. 2.

Applicants respectfully disagree. To begin, the wiring patterns 34a, 34b, 34c are not integrated with Takahashi's "sensor module 50". Rather, they are printed on a board to which the sensor module 50 is mated during board test. Although the sensor module 50 does contain via through-holes 66a, 66b, 66c and electrode plates 62a, 62b, 62c, these vias and electrodes are not "passive circuit components". Rather, Takahashi's sensor module 50 only provides an ability to create passive circuit components when it is mounted to a board, with the board supplying a pad section 38 that, in combination with the electrode plates 62a, 62b, 62c of the sensor module 50, forms passive circuit components. This, however, does not meet applicants' limitation of "a plurality of passive circuit components ***integrated*** with the package". Takahashi's passive circuit components are only formed ***between*** his sensor module 50 and a board under test. As disclosed by applicants in paragraph [0041], the integration of passive circuit components into a package provides for more precise control of the values of the components, which is a feature not offered by Takahashi's sensor module 50 (i.e., the module 50 allows passive circuit component values to be influenced by the planarity of a board under test and other factors).

If the Examiner believes that vias and electrodes alone can be construed as "passive circuit components", applicants disagree, as this construes the term "passive circuit component" differently and more broadly than how it is commonly construed in the art. Although a via or electrode may have some associated resistance or capacitance, Takahashi seems to presume they are "ideal" and have none. See, for example, Takahashi's discussion of the equivalent circuit for his sensor module 50 beginning at column 6, line 58. In addition, applicants offer the comment of one engineering text, which states, "The three common passive elements are resistors, capacitors, and inductors." See, J. David Irwin, "Basic Engineering Circuit Analysis", Macmillan Publishing Company, p. 10, sec. 1-3 (1984).

Applicants' claim 1, and the claims dependent thereon, are believed to be allowable over Takahashi for at least the above reason. Claims 16 and 20, and the claims dependent thereon, are believed to be allowable for similar reasons.

Applicants' claim 13 is believed to be further allowable over Takahashi in that Takahashi does not disclose any ability to test a board using parallel "resistances" that are integrated with a test package. As mentioned above, Takahashi presumes the vias and electrodes of his sensor module 50 to be "ideal", having no resistance. The Examiner's indication that Takahashi's vias and electrodes have known and usable resistances therefore reads more into Takahashi than what Takahashi fairly teaches.

Applicants' claim 20 is believed to be further allowable over Takahashi in that Takahashi does not provide any teaching related to intersecting sets of passive circuit components. As discussed in applicants' specification, intersecting sets of passive circuit components can be used as a "fault addressing scheme" to determine where opens and shorts exist (see paragraph [0049]).

2. Rejection of claims 5-10, 21 and 22 Under 35 USC 103(a)

Claims 5-10, 21 and 22 stand rejected under 35 USC 103(a) as being unpatentable over Takahashi in view of Marek (US Pat. No. 5,159,526).

With respect to claims 5-7, 9, 21 and 22, applicants assert that these claims are allowable at least for the reason that they depend from other allowable claims, and because Marek does not disclose the features that applicants have asserted are missing from Takahashi. See Section 1 of these Remarks, *supra*.

With respect to claims 8 and 10, the Examiner admits that the combination of Takahashi and Marek does not disclose the features of these claims (i.e., claim 8: "a different number of the plurality of capacitors is coupled to each of the plurality of contacts on the package"; and claim 10: "each of the plurality of capacitors has a different value"). However, the Examiner asserts that it would have been obvious at the time of the invention to provide different numbers and values of capacitors in a test package. Applicants disagree. Not only are Takahashi and Marek silent on such modifications, but they do not even introduce the motivation for such different numbers and values – that is, to provide a fault addressing scheme. See, for example, paragraphs [0044] and [0045] of applicants' specification.

3. Conclusion

In light of the above Remarks, applicants respectfully request the timely issuance of a Notice of Allowance.

Respectfully submitted,
DAHL & OSTERLOTH, L.L.P.

By: ______________________
Gregory W. Osterloth
Reg. No. 36,232
Tel: (303) 291-3200